

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

FAIR ISAAC CORPORATION,

Court File No. 16-cv-1054 (WMW/DTS)

Plaintiff,

v.

**DEFENDANTS' PROPOSED VOIR
DIRE QUESTIONS**

FEDERAL INSURANCE COMPANY,
an Indiana corporation, and ACE
AMERICAN INSURANCE COMPANY, a
Pennsylvania corporation,

Defendants.

DEFENDANTS' PROPOSED VOIR DIRE QUESTIONS

Defendants respectfully request that the Court conduct a standard voir dire including questions about any hardship associated with three weeks of jury service, language fluency and comprehension, county and neighborhood of residence, level of education, employment, marital and family status and history, and records of prior jury service.

In addition, Defendants respectfully request that the Court ask the following specific questions during voir dire:

1. Have you or any close friends or family members ever been employed by Fair Isaac Corporation, which is often referred to as "FICO," Federal Insurance Company, ACE American Insurance Company, or the Chubb Group of Insurance Companies?
2. Have you, a close friend, or family member ever had any business dealings with any of those companies?
3. Are you familiar with business-rules-management software, business-rules engines, or decision-management software?
4. Are you familiar with the Blaze Advisor software at issue in this case?
5. Do you have any experience negotiating software licenses, drafting software licenses, or conducting business that involves software licenses?
6. Do you have any experience owning or protecting intellectual property of any kind, including copyrights, trademarks, or patented technology?
7. Have you ever been employed by a software company or technology company?

8. Do you have any experience building computer applications or writing computer code?
9. Do you have any experience negotiating or drafting contracts?
10. Do you have any experience conducting due diligence in connection with a corporate merger or acquisition?
11. Have you or a close friend/family member ever had any insurance claim you believe was wrongfully denied? What were the circumstances of that claim and denial?
12. Have any of you, your close friends, or family members ever filed a lawsuit against an insurance company?
13. Do you now or have you ever owned a business or been self-employed? Is the business still operating? If not, what were the circumstances of its closure?
14. Do you know of any other reason, or has anything occurred during this questioning, that might make you doubtful you would be a completely fair and impartial juror in this case? If there is, it is your duty to disclose those concerns.

Dated: January 25, 2023

/s/ Terrence J. Fleming
Terrence J. Fleming (#0128983)
tfleming@fredlaw.com
Leah C. Janus (#0337365)
ljanus@fredlaw.com
Christopher D. Pham (#0390165)
cpham@fredlaw.com
Ryan C. Young (#0397751)
ryoung@fredlaw.com
Panquia Vang (#399444)
pvang@fredlaw.com
FREDRIKSON & BYRON P.A.
200 South Sixth Street, Suite 4000
Minneapolis, MN 55402-1425
Tel: (612) 492-7000
Fax: (612) 492-7077

Leah Godesky (Admitted Pro Hac Vice)
lgodesky@omm.com
Anton Metlitsky (Admitted Pro Hac Vice)
ametlitsky@omm.com
Daryn E. Rush (Admitted Pro Hac Vice)
drush@omm.com
Roxana Guidero (Admitted Pro Hac Vice)
rguidero@omm.com
O'MELVENY & MYERS LLP

Times Square Tower
7 Times Square
New York, NY 10036
Tel: (212) 326-2000

*Attorneys for Defendants Federal Insurance
Company and ACE American Insurance Company*